

This document is a version of Defendants' juror questionnaire reflecting Plaintiffs' proposed changes. Plaintiffs' new language appears in red and the language removed by the Plaintiffs appears crossed out AND in blue.

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JUROR QUESTIONNAIRE

Juror # _____

This questionnaire has been approved by the Court and is to be filled out completely by each prospective juror in black ink. This information is designed solely to save time and assist the Court and the parties in selecting jurors for the trial. This information will not be used for any other purpose except to select a jury. The questions asked in this questionnaire could be asked in open court. You are given more privacy by answering them in this questionnaire. **YOU ARE UNDER OATH AND ARE REQUIRED TO ANSWER THE QUESTIONS TRUTHFULLY.** Please read each item carefully and write your answer clearly and firmly.

~~Please fill out this form completely in black ink.~~ Since we need to make copies, **do not** write on the back of any page. If you need more room, continue at the bottom or side of the page, or on the last page (noting question number).

JUROR'S NAME: (Please Print): _____

1. Age: _____
2. Occupation: _____ For how long? _____
3. Town or area where you live: _____
4. How long have you lived in Oklahoma? _____
5. What other cities or towns have you lived in, and how long did you live there? (Please note if you have lived in another state or country.)

6. What is your current job status?

_____ Working full-time	_____ Unemployed
_____ Working part-time	_____ Homemaker
_____ Full-time student	_____ Part-time student
_____ Retired. When? _____	

7. a. What company or organization do you work for?

- b. What do you do at work? ~~If not currently working, what did you do in your last job?~~

- c. Do you have management or supervisory responsibilities? Yes _____ No _____

- ~~d. Over the periods of your working life, what are the typical types of jobs you have had?~~

- ~~d.e.~~ Have you ever worked for a federal, state or local government ~~or state~~ agency?

Yes _____ No _____

If yes, please identify the agency and describe your job duties:

8. Have you or has anyone close to you ever owned your/their own business?

Yes _____ No _____

If yes, what type of business, how long have you or they owned it, etc.?

9. What high school did you attend (name, city, and state)? _____

- a. What is the last level of education you completed?

_____ Grade school or less _____ Some college

_____ Some high school _____ College graduate
 _____ High school graduate _____ Post graduate work
 _____ Technical or business school

b. Please list any degrees you may have, the schools and colleges you attended, and your major areas of study.

c. If you are currently a student, what are you studying? _____

10. What were your favorite subjects? _____

11. What were your least favorite subjects? _____

12. Do you or does anyone close to you have any employment, education, training or experience in the following areas? **ANSWER EACH PART, (a) THROUGH (n)**

	<u>Yes, self</u>	<u>Yes, someone close</u>	<u>Yes, both</u>	<u>No</u>
a) Agribusiness (including Livestock, Poultry, Forestry, etc.)	_____	_____	_____	_____
b) Agriculture/Farming	_____	_____	_____	_____
c) Government standards, regulations	_____	_____	_____	_____
d) Health care or safety	_____	_____	_____	_____
e) Insurance	_____	_____	_____	_____
f) Journalism/Media	_____	_____	_____	_____
g) Law/Legal/Lawyer	_____	_____	_____	_____
h) Law enforcement/Police/Public Safety	_____	_____	_____	_____
i) Mining	_____	_____	_____	_____
j) Environmental Protection/Preservation/Ecology	_____	_____	_____	_____
k) Waste Management/Disposal (including Hazardous Materials)	_____	_____	_____	_____
l) Science (including Biology, Chemistry, Geology, Hydrology, etc.)	_____	_____	_____	_____

- m) Real Estate
- n) Construction

_____	_____	_____	_____
_____	_____	_____	_____

12. Please circle any of the following fields in which you have experience or training, including seminars, and then describe your training or experience in the following blank lines.

Legal field/law	Real Estate	Ecology
Management	Health Care	Construction
Mining	Hazardous Materials/Waste	Forestry
Environmental Protection/Preservation	Brownfield Development	Agriculture
Law Enforcement/Investigations	Environmental Sciences	Agribusiness
Livestock Management	Chemistry	Hydrology
Geology	Removal/Cleanup of Waste	Public Safety
Science (any field)		

b. Please describe the experiences or training that you circled: _____

13. What is your marital status? _____

_____ Single and never married

_____ Currently married and have been for _____ years

_____ Married in the past for _____ years

_____ Single, but living with non-marital mate for _____ years

_____ Widowed/widower married in the past for _____ years

_____ Other _____

14. What is the occupation of your spouse or mate?

15. What is the educational background of your spouse or mate?

16. What are/were your parents' occupations?

Mother: _____

Father: _____

17. If you have children, please state:

Name	Sex (M/F)	Age	Does child live w/you?	Education	Occupation

18. Have you ever been in the military?

a. Yes _____ No _____

_____ Army

_____ Marines

_____ Air Force

_____ Coast Guard

_____ Navy

_____ Reserves

b. If yes, what were the approximate dates of your service? _____

~~c. What were your job duties in your last service position? _____~~

~~19. Do you know any attorneys or judges? Yes _____ No _____~~

If Yes, who? _____

19. ~~20.~~ What social, political, civic, ~~church~~, professional, or other organizations do you belong to or are you associated with?

Name of Organization	Offices You Have Held

20. ~~21.~~ What are your hobbies, major interests, recreational pastimes, and spare-time activities?

21. ~~22.~~ a. How closely do you follow the news on either radio, TV, or in the newspapers?

_____ Several times a day

_____ Once a day

_____ Several times a week

_____ Occasionally/Almost never

- b. What newspapers, magazines, and other publications do you read, if any, on a regular basis?

~~c. Do you get news off of the Internet? If so, please describe the news websites you visit.~~

~~d. Do you believe the news you read and hear in the media is mostly accurate or inaccurate?~~

22. What TV programs do you watch?

23. How frequently do you use the internet?

☐ Very frequently (multiple times a day) ☐ Somewhat frequently (a few times a week)
☐ Rarely/Never

a. What sites do you regularly visit for news?

24. ~~23.~~ Are you registered to vote? Yes ☐ No ☐

~~24. What is your political party preference?~~

☐ Democrat ☐ Republican ☐ Green
☐ Independent ☐ Other (identify) ☐

25. Have you ever served as a juror in the past? Yes ☐ No ☐

a. If Yes, ~~When?~~ how many times:

~~b. When?~~

~~b. e.~~ Type of case(s)

c. Were you the foreman?

d. Did the case(s) reach a verdict?

~~If not, was that because the jury could not agree on a verdict or because of some other reason?~~

~~Give reason:~~

~~e. How did you feel about your jury service?~~

26. Have you or anyone in your family ever sued or been sued by anyone?

Yes _____ No _____ If Yes:

a. ~~Who:~~ _____

a. ~~b.~~ Why? _____

c. ~~When:~~ _____

b. ~~d.~~ What was the result of the claim? _____

c. ~~e.~~ Were you satisfied with the result? _____

27. ~~Some people think that there are too many lawsuits being filed these days. What do you think about lawsuits in general?~~

28. ~~What do you think about people who bring lawsuits?~~

27. Do you think there should be limits on the amount of money juries can award? ___Yes ___No

28. ~~29.~~ If you thought you were injured because of the fault of someone else, would you consider bringing a lawsuit?

Yes _____ No _____

~~Please explain:~~ _____

30. ~~Do you eat organic foods or do you encourage your family or friends to do so?~~

~~Yes _____ No _____~~

~~If yes, please explain: _____

_____~~

29. 31. To what extent do you agree or disagree with the following statement: Complying with environmental laws is ~~more~~ ~~less~~ important to large corporations than making a profit.

_____ Strongly Agree _____ Somewhat Agree
_____ Somewhat Disagree _____ Strongly Disagree
_____ Unsure

32. ~~To what extent do you agree or disagree with the following statement: Most large companies follow the law.~~

_____ Strongly Agree _____ Somewhat Agree
_____ Somewhat Disagree _____ Strongly Disagree

33. ~~To what extent do you agree or disagree with the following statement: Most large companies are ethical.~~

_____ Strongly Agree _____ Somewhat Agree
_____ Somewhat Disagree _____ Strongly Disagree

34. Please read the following statement and indicate whether you agree or disagree with it, either strongly or somewhat.

a. ~~If a company complies with the environmental laws enacted by the State in which it operates, then a person should not be allowed to file a lawsuit against that company regarding environmental issues.~~

_____ Strongly Agree _____ Somewhat Agree
_____ Somewhat Disagree _____ Strongly Disagree

b. ~~If the government tells a company or individual they may do something and gives instructions on how it should be done, the government should not be allowed to file a lawsuit against those people for doing what the government said to do.~~

_____ Strongly Agree _____ Somewhat Agree

_____ Somewhat Disagree _____ Strongly Disagree

30. ~~35.~~ Here are ~~two~~ three different statements about civil lawsuits. Please check the line that best reflects your opinion.

a. Civil lawsuits help to protect the public.

_____ Strongly Agree
 _____ Somewhat Agree
 _____ Somewhat Disagree
 _____ Strongly Disagree

b. Civil lawsuits make the price of goods and services more expensive.

_____ Strongly Agree
 _____ Somewhat Agree
 _____ Somewhat Disagree
 _____ Strongly Disagree

~~36. Have you or anyone close to you worked for any federal, state, or local governmental agency?~~

~~Yes _____ No _____~~

~~If Yes, please identify the agency and describe your job duties: _____~~

31. ~~37.~~ Do you do any work that is subject to regular inspections ~~examinations~~ or supervision by federal, state, or local regulatory agencies?

Yes _____ No _____

If Yes, please explain: _____

32. ~~38.~~ Have you or any close relatives ever worked for a company that has had to deal with environmental problems?

Yes _____ No _____

If Yes, please explain: _____

33. ~~39.~~ a. Have you ever had a negative experience with Oklahoma State government or any state agency? ~~How do you feel about the Oklahoma state government?~~

Yes _____ No _____

If Yes, please explain: _____

b. ~~How do you feel about the Arkansas state government?~~ _____

34. ~~40.~~ Have you or anyone close to you ~~in your family~~ ever worked, in any capacity, for a lawyer, a law firm, or the legal department of a company or government agency? ~~had any training or experience as a lawyer?~~

Yes _____ No _____

If Yes, please explain who, where they worked and what they did ~~identify who and provide details of that training or experience.~~

~~41. Have you or anyone in your family ever worked, in any capacity, for a lawyer, a law firm, or the legal department of a company or government agency?~~

~~_____ Yes _____ No _____~~

~~If Yes, please identify who worked for a lawyer, a law firm, or the legal department of a company or governmental agency.~~

~~_____~~

~~_____~~

~~If Yes, please identify the lawyer, law firm, or legal department worked for (Name of business/lawyer, City, State).~~

~~If Yes, please describe your or your family members' job and duties.~~

35. ~~42.~~ What is your general opinion of lawyers?

_____ Favorable _____ Unfavorable _____ No opinion

Why do you feel that way? _____

~~43. Have you ever worked for or with the ODEQ or EPA or any other environmental protection agency or organization?~~

~~_____ Yes _____ No _____~~

~~If Yes, please (1) name who you worked for or with, (2) explain your duties, and (3) state how long you have been involved with that agency or organization: _____~~

36. ~~44.~~ Do you have any concerns about federal or state environmental laws or regulations?

Yes _____ No _____

If Yes, please explain. _____

~~45. a. Do you consider yourself to be an environmentalist? ☐ Yes ☐ No~~

~~b. Have you ever belonged to any environmental club or group?~~

_____ Yes _____ No _____

If Yes, please (1) name the group, (2) explain your involvement, and (3) state how long you have been involved with that group: _____

37. Have you ever belonged to any environmental club or group?

Yes _____ No _____

If Yes, please explain. _____

a. Have you ever belonged to any agricultural or farming club or group?

Yes _____ No _____

If Yes, please name the group: _____

38. ~~46.~~ Have you or any close relative ever worked in the poultry industry or for an agency or organization that regulates the poultry industry?

Yes _____ No _____

If Yes, please state ~~(1)~~ who worked in the poultry industry and, ~~(2)~~ what is your relationship with the person, ~~(3)~~ the name of the company or organization they worked for, ~~(4)~~ when and how long you (or your close relative) worked in the poultry industry, and ~~(5)~~ the position and job duties held.

39. ~~47.~~ Have you, or anyone close to you, ever visited the Illinois River, Caney Creek, Flint Creek, Baron Fork, or Lake Tenkiller?

Yes _____ No _____

If Yes, please explain the nature of your visit ~~when and why you visited:~~

~~If Yes, did you observe any environmental problems that concerned you?~~ Are you aware of any environmental problems in that area?

Yes _____ No _____

If Yes, please explain: _____

~~If Yes, compared to other parts of the country, how would you describe the quality of the water in the Illinois River Watershed? (Check one.)~~

~~☐ much worse ☐ worse ☐ about the same ☐ better ☐ much better ☐ not sure~~

40. What conversations have you had, if any, regarding the Illinois River Watershed?

Casual Conversation___ Taken or given survey___ Group discussion___ None___

41. The following is a list of some of the companies involved in this lawsuit. Please check the lettered column corresponding to the statement if true for that company. If none of the statements are true for that particular company, do not check any of the columns.

A. I have heard of this company

B. I, or a family member, has been employed by this company

C. I, or a family member, has had business dealings with this company

	A	B	C
Cobb-Vantress, Inc.			
George's Inc. or George's Farms Inc.			
Peterson Farms, Inc.			
Simmons Foods, Inc.			
Tyson Foods, Tyson Poultry, or Tyson Chicken			
Cal-Maine Foods, Inc. or Cal-Maine Farms, Inc.			
Cargill, Inc. or Cargill Turkey Production, Inc.			

~~48. Have you ever heard of the company, Cobb-Vantress, Inc.?~~

~~Yes _____ No _____~~

~~If Yes, please explain how you are familiar with the company and what you have heard about the company:~~

~~49. Have you ever heard of a company named George's, Inc. or George's Farms, Inc.?~~

~~Yes _____ No _____~~

~~If Yes, please explain how you are familiar with the company and what you have heard about the company:~~

~~50. Have you ever heard of the company, Peterson Farms, Inc.?~~

~~_____ Yes _____ No _____~~

~~If Yes, please explain how you are familiar with the company and what you have heard about the company:~~

~~_____

_____~~

~~51. Have you ever heard of the company, Simmons Foods, Inc.?~~

~~_____ Yes _____ No _____~~

~~If Yes, please explain how you are familiar with the company and what you have heard about the company:~~

~~_____

_____~~

~~52. Have you ever heard of a company named Tyson Foods, Inc., Tyson Poultry, Inc. or Tyson Chicken, Inc.?~~

~~_____ Yes _____ No _____~~

~~If Yes, please explain how you are familiar with the company and what you have heard about the company:~~

~~_____

_____~~

53. Have you ever heard of a company named Cal Maine Foods, Inc. or Cal Maine Farms, Inc.?

____ Yes _____ No _____

If Yes, please explain how you are familiar with the company and what you have heard about the company:

54. Have you ever heard of a company called Cargill, Inc. or Cargill Turkey Production, Inc.?

____ Yes _____ No _____

If Yes, please explain how you are familiar with the company and what you have heard about the company:

55. Have you ever heard of Drew Edmondson?

____ Yes _____ No _____

If Yes, please explain how you are familiar with Drew Edmondson and what you have heard about him:

~~56. Have you ever made a donation to Drew Edmondson in connection with his political campaigns?~~

~~Yes _____ No _____~~

42. ~~57.~~ Have you ever seen a movie or documentary that focused on either animal welfare, food safety or environmental issues related to “large” poultry farms?

Yes _____ No _____

~~If Yes, please describe any impressions you formed from watching such movies or documentaries and state the title of the movie or documentary (if you recall it):~~

~~58. Have you ever used any type of fertilizer on any of the following (check ALL that apply)?~~

~~_____ Lawn of a residence _____ Lawn of a business _____ None~~

~~_____ Garden of a residence _____ Garden of a business~~

~~_____ Pasture _____ Crop~~

~~Other (describe) _____~~

43. ~~59.~~ Have you ever used animal manure ~~or other organic material (e.g., compost) as a fertilizer on~~ your property?

Yes _____ No _____

If Yes, please explain: _____

~~60. Have you been involved in farming?~~

~~Yes _____ No _____~~

~~If Yes, what type? _____~~

44. ~~61.~~ Have you been involved in cattle ranching or raising livestock?

If Yes, describe your experience: _____

45. ~~62.~~ Have you ever lived near a poultry farm or poultry processing facility?

Yes _____ No _____

If Yes, please describe your experience: _____

46. Do you or anyone close to you have any connection to the Cherokee Nation or any other Native American nation?

Yes _____ No _____

If Yes, please explain: _____

47. Do you have any physical or medical problems that could make jury duty difficult for you?

Yes _____ No _____

If Yes, please explain: _____

48. If the State of Oklahoma proves its case against the Poultry Companies, would you have any difficulty awarding substantial money damages to the State? Yes _____ No _____

49. If the State of Oklahoma does not prove its case against the Poultry Companies, would you have any difficulty awarding zero damages to the State? Yes _____ No _____

~~64. Have you, any relatives, or close friends ever suffered a long-term or permanent disability?~~

~~Yes _____ No _____~~

~~If Yes, please describe: _____~~

~~_____

_____~~

~~65. Is there any reason whatsoever that you should not serve on this jury, would be unable to do so, or that jury duty would present a serious hardship?~~

~~Yes _____ No _____~~

~~If Yes, please explain: _____~~

~~_____~~

~~_____~~

50. ~~66.~~ Please use this space to inform the court of any further information you feel concerns your ability to serve as a trial juror.

Juror Signature